REMARKS

This amendment is submitted along with a Request for Continued Examination and appropriate fee in reply to the outstanding Office Action dated November 1, 2006. Claims 1-38 currently stand rejected. Applicant has amended independent claims 1, 6, 15 and 21 to more particularly distinguish the claimed invention from the cited references. No new matter has been added by the amendment. Claims 5, 14, 19, 29, 32-34 and 36-38 have been canceled, without prejudice.

In light of the amendment and the remarks presented below, Applicants respectfully request reconsideration and allowance of all now-pending claims of the present application.

Claim Rejections - 35 USC §103

Claims 1-7, 10-22 and 25-38 currently stand rejected under 35 U.S.C. §103(a), as being unpatentable over Satran et al. (U.S. Patent No. 6,430,183, hereinafter "Satran") in view of Stapleton et al. (U.S. Patent No. 6,175,875, hereinafter "Stapleton"). Claims 8, 9, 23 and 24 stand rejected under 35 U.S.C. §103(a), as being unpatentable over Satran in view of Stapleton and further in view of Haggerty et al. (U.S. Patent No. 6,331,983, hereinafter "Haggerty"). Claims 5, 14, 19, 29, 32-34 and 36-38 have been canceled, without prejudice, and thus the rejections of these claims are now moot.

Applicants have amended independent claim 1 to recite, *inter alia*, storing, in a control unit, tables of addresses of receivers belonging to a multicast group and specific parameters of the receivers, wherein the specific parameters comprise parameters which are dependent on receiver conditions. In other words, independent claim 1 recites both storing, in a control unit, tables of addresses of receivers belonging to a multicast group and storing, in a control unit, specific parameters, of the receivers, that are dependent on receiver conditions.

As will be seen below, an embodiment of the claimed invention provides a multicast address that is communicated from a routing unit to a control unit. In the control unit, by searching the tables based on the multicast address, addresses of receivers of the multicast group are indicated by the multicast address and the specific parameters of the receivers are

determined. The addresses and specific parameters are provided to the routing unit where the multicast data packets/addresses are filtered in accordance with the specific parameters for each receiver of the multicast group. Then, the routing unit transmits the multicast data packets to the addresses of the receivers or transmits the multicast data packets to the filtered receiver addresses. With this arrangement, centralized, flexible and adaptive filtering based on specific filtering parameters taking into account e.g., reachability of the receiver, available bandwidth, type of terminal screen and the like, can be achieved.

Satran discloses a data transmission system which comprises a plurality of transmitters that transmit data over a broadband channel to multiple receivers (see col. 3, lines 30-33). According to Satran, each packet of data itself includes information for use in determining, by a receiver, whether the packet is to be received by the receiver. Satran fails to teach or suggest any storage of either tables of addresses or specific parameters of the receivers as recited in independent claim 1.

However, Applicants respectfully note that the Office Action cites Satran as disclosing "receivers belonging to a multicast group in a packet-switched network and specific parameters of the receivers" at col. 4, lines 48-60 of Satran. Applicants initially note that even if one assumes for the sake of argument that Satran discloses receivers belonging to a multicast group in a packet-switched network and specific parameters of the receivers as asserted by the Office Action, Satran still fails to teach or suggest storing of such information in a control unit. This is particularly true in light of the fact that independent claim 1 further defines that the specific parameters comprise parameters which are dependent on receiver conditions which was formerly recited in claim 5. In rejecting claim 5, the Office Action cites Satran at col. 5, lines 15-43. However, the cited passage only refers to a masking feature enabling a receiver to search for a particular multicast address or accept all multicast addresses. There is no teaching or suggestion provided by the cited passage, or indeed in all of Satran, of *storing* specific parameters comprising parameters which are dependent on receiver conditions. The fact that a receiver includes a masking feature is in no way suggestive that specific parameters dependent on receiver conditions are, or even should be, stored at a control unit as generally set forth in the claimed invention. Furthermore, Satran fails to teach or suggest the storing of a table of

addresses of receivers as admitted in the Office Action. Thus, Satran fails to teach or suggest both <u>storing, in a control unit, tables of addresses of receivers belonging to a multicast group</u> and <u>storing, in a control unit, specific parameters, of the receivers, that are dependent on receiver conditions</u> as recited in independent claim 1.

Having admitted that Satran fails to teach or suggest <u>storing tables of addresses of receivers belonging to a multicast group</u>, the Office Action cites Stapleton as curing the deficiency of Satran. However, as stated above, Satran not only fails to teach or suggest <u>storing tables of addresses of receivers belonging to a multicast group</u>, but Satran also fails to teach or suggest <u>storing specific parameters of the receivers</u> as also claimed in independent claim 1.

Stapleton describes multicast filtering using a repeater (14). The repeater (14) comprises ports connected to a repeater core (142), which provides basic repeater functions such as retransmitting received communication packets on ports other than the port on which the packets were received. The repeater (14) also includes means for storing an address table (144) which defines the basic operation of the repeater (14) (col. 7, lines 9-11). The address table (144) stores details of multicast communications addresses and relates each address to a desired action in respect of each repeater port (col. 7, lines 16-19). However, the address table (144) of Stapleton is not used to store specific parameters of receivers as recited in the claimed invention. Moreover, Stapleton fails to provide any teaching or suggestion of <u>storing specific parameters of the receivers</u> as claimed in independent claim 1. Thus, Stapleton also fails to teach or suggest <u>storing, in a control unit, specific parameters, of the receivers, that are dependent on receiver conditions</u> as generally set forth in independent claim 1.

Applicants also respectfully note that, even if one were to assume that Satran discloses receivers having specific parameters and that Stapleton discloses storage of address information of receivers, the combination of the disclosures of Satran and Stapleton would merely provide receivers with specific parameters whose address information is stored in an address table. Additionally, there is no indication of any disclosure in either reference that would provide any motivation or suggestion to one of skill in the art to actually store specific parameters of the receivers that are dependent on receiver conditions in a control unit.

Independent claim 1 also recites, *inter alia*, <u>determining, by searching the tables based on</u> <u>the multicast address, addresses of receivers of the multicast group indicated by the multicast</u> <u>address</u> **and the specific parameters of the receivers**. Satran fails to disclose any searching of tables and the tables of Stapleton are not searched for specific parameters of receivers. Moreover, since neither Satran nor Stapleton provide for storing specific parameters of the receivers, each reference and the combination thereof also necessarily fails to teach or suggest <u>determining, by searching the tables based on the multicast address, addresses of receivers of the</u> <u>multicast group indicated by the multicast address</u> **and the specific parameters of the receivers** as recited in independent claim 1.

Haggerty fails to cure the above described deficiencies of both Satran and Stapleton and is not cited as such. Since none of the cited references alone teach or suggest <u>storing, in a</u> <u>control unit, specific parameters, of the receivers, that are dependent on receiver conditions</u> or <u>determining, by searching the tables based on the multicast address, addresses of receivers of the</u> <u>multicast group indicated by the multicast address</u> **and the specific parameters of the receivers** as recited in independent claim 1, any combination of the cited references likewise fails to render independent claim 1 obvious for at least the same reasons described above. Independent claims 6, 15 and 21 have also been amended to include similar recitations to those described above in reference to independent claim 1. Thus, independent claims 6, 15 and 21 are patentable for at least those reasons given above for independent claim 1. Claims 2-4, 7-13, 16-18, 20, 22-28, 30, 31 and 35 depend either directly or indirectly from a respective one of independent claims 1, 6, 15 and 21, and as such, include all the recitations of their respective independent claims. The dependent claims 2-4, 7-13, 16-18, 20, 22-28, 30, 31 and 35 are therefore patentably distinct from the cited references, individually or in combination, for at least the same reasons as given above for independent claims 1, 6, 15 and 21.

Accordingly, for all the reasons above, Applicants respectfully submit that the rejections of claims 1-4, 6-13, 15-18, 20-28, 30, 31 and 35 are overcome.

CONCLUSION

In view of the amendments and the remarks submitted above, it is respectfully submitted that the present claims are in condition for immediate allowance. It is therefore respectfully requested that a Notice of Allowance be issued. The Examiner is encouraged to contact Applicants' undersigned attorney to resolve any remaining issues in order to expedite examination of the present invention.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,

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